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Of Attorneys for Defendants  
5 Alireza Zamanizadeh, a/k/a Ali  
Zamani and Adult Care Search  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF OREGON**  
10 **PORTLAND DIVISION**

11 **ANGELA TORRES, an individual,**

12 **Plaintiff,**

13 **v.**

14 **ALIREZA ZAMANIZADEH, a/k/a ALI**  
15 **ZAMANI, an individual, and ADULT**  
16 **CARE SEARCH, a foreign non-profit**  
**corporation,**

**Defendants.**

Case No. 3:17-cv-01270-AC

**DECLARATION OF TIMOTHY J.**  
**CALDERBANK**

17 I, Timothy J. Calderbank, hereby state and declare as follows:

18 1. My name is Timothy J. Calderbank. I am over the age of 18 and am  
19 otherwise competent to be a witness in this proceeding. I make this declaration based  
20 upon my personal knowledge except as otherwise set forth.

21 2. I am the attorney for the Defendants in this action.

22 3. Court preliminarily ordered all assets and monies frozen from the bank  
23 accounts of Defendants.

24 4. Only court-authorized payments, including legal fees, can be made with  
25 no guarantee the firm would ever be paid.  
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- 1           5.     Attorney has lost faith in clients' ability to cooperate meaningfully;
- 2           6.     Attorney may become a fact witness;
- 3           7.     Client refusing to following attorney's advice;
- 4           8.     The attorney has a conflict of interest or cannot otherwise continue
- 5     representing defendants without violating the rules of professional conduct.

6           **I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF**  
7     **THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND**  
8     **CORRECT.**

9           DATED: January 25, 2018

10          AT: Vancouver, Washington.

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LANDERHOLM, P.S.

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/s/ Timothy J. Calderbank  
TIMOTHY J. CALDERBANK, OSB #45682  
Of Attorneys for Defendants

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**CERTIFICATE OF SERVICE**

I certify that I electronically filed the foregoing **DECLARATION OF TIMOTHY J. CALDERBANK** with the Clerk of the Court for the United States District Court, District of Oregon, by using the CM/ECF system on 25th day of January, 2018, namely to:

David W. Richardson  
PDX Law Group, P.C.  
121 SW Morrison St, Suite 1520  
Portland, OR 97204

**VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED**

Alireza Zamanizadeh  
Adult Care Search, Inc.  
613 SW Elderbrook Place  
Portland, OR 97225

Signed at Vancouver, Washington this 25<sup>th</sup> day of January, 2018.

/s/ Timothy J. Calderbank  
TIMOTHY J. CALDERBANK, OSB #45682